

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF ePLUS INC.’S OBJECTIONS TO DEFENDANT  
LAWSON SOFTWARE, INC.’S DISCOVERY DESIGNATIONS AND SUMMARIES  
FOR CONTEMPT PROCEEDINGS**

Pursuant to Federal Rules of Civil Procedure 32 and 33(c), Local Rule 30(F) and (G), and the Scheduling Order Concerning Contempt Proceedings (Dkt. No. 849), Plaintiff ePlus Inc. (“ePlus” or “Plaintiff”), by and through its attorneys, hereby submits the following objections to the affirmative designations, fairness designations, counter designations and designation summaries of Defendant Lawson Software, Inc. (“Defendant” or “Lawson”):

1. Objections to Lawson’s fairness deposition designations and summaries for the December 19-20, 2011 deposition of Dale A. Christopherson attached as Appendix 1.
2. Objections to Lawson’s fairness deposition designations and summaries for the December 21, 2011 deposition of Todd Dooner attached as Appendix 2.
3. Objections to Lawson’s fairness deposition designations and summaries for the January 6, 2012 deposition of Dean J. Hager attached as Appendix 3.
4. Objections to Lawson’s fairness deposition designations and summaries for the December 29, 2011 deposition of Scott D. Hanson attached as Appendix 4.
5. Objections to Lawson’s fairness deposition designations and summaries for the December 21, 2011 deposition of Elizabeth R. Homewood attached as Appendix 5.

6. Objections to Lawson's fairness deposition designations and summaries for the January 6, 2012 deposition of Keith D. Lohkamp attached as Appendix 6.

7. Objections to Lawson's fairness designations and summaries for the January 9, 2012 deposition of Kurt Reasoner attached as Appendix 7.

8. Objections to Lawson's fairness deposition designations and summaries for the January 5, 2012 deposition of Kevin Samuelson attached as Appendix 8.

9. Objections to Lawson's affirmative designations, counter-designations and summaries for the January 9, 2012 deposition of Kurt Reasoner attached as Appendix 9.

10. Objections to Lawson's affirmative designations, counter-designations and summaries for the December 27, 2011 deposition of Kenneth Farber attached as Appendix 10.

*e*Plus may rely on any testimony, exhibits, or evidence adduced and admitted at trial or the injunction hearing that are relevant to the contempt proceedings.

Respectfully submitted,

February 20, 2012

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of February 2012, I will electronically file the foregoing

**Plaintiff ePlus Inc.'s Objections to Defendant Lawson Software, Inc.'s Discovery Designations and Summaries for Contempt Proceedings**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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